IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA Charlottesville Division

DR. TARRON RICHARDSON,

Plaintiff,

v.

Case No. 3:21-cv-45

CITY COUNCIL OF THE CITY OF CHARLOTTESVILLE, HEATHER HILL, LISA ROBERTSON, NIKUYAH WALKER, AND JOHN BLAIR,

Defendants.

MOTION TO DISMISS

NOW COMES Defendant, Lisa Robertson ("Robertson"), by counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and moves this Court to dismiss, with prejudice, the Complaint filed against her, as it fails to state a claim upon which relief can be granted and fails to allege facts sufficient to establish a legally cognizable cause of action. Robertson relies upon and incorporates her Brief in Support of this Motion to Dismiss as if fully set forth herein.

WHEREFORE, Lisa Robertson, respectfully requests that this Court enter an Order granting the Motion to Dismiss and dismissing the Complaint against her with prejudice.

LISA ROBERTSON

By Counsel

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CERTIFICATE

I hereby certify that on the 26th day of January, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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